

EXHIBIT 16

Via ICFS

September 19, 2025

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20054

**Re: Application of Planet Labs PBC for Modification of License,
ICFS File No. SAT-MOD-20250527-00129**

Dear Ms. Dortch:

Ligado Networks LLC (“Ligado”) submits this letter in response to a letter filed by Viasat, Inc. on September 9, 2025,¹ with respect to the above-referenced application of Planet Labs PBC (“Planet”). Ligado appreciates Viasat restating that “Planet’s proposed L-band operations would be nonconforming in nature and therefore would necessarily proceed on an ‘unprotected and non-harmful interference basis.’”² Ligado does, however, want to ensure the record of this proceeding accurately reflects L-band coordination arrangements.

While it is true that Inmarsat, Viasat’s subsidiary, has coordinated access to channels in the L-band, these channels are coordinated only for Mobile Satellite Service (“MSS”) use and *not* Intersatellite Service (“ISS”). Nor has Ligado (or, to Ligado’s knowledge, any other coordinating party) otherwise agreed that Inmarsat, or anyone else, can use its coordinated L-band spectrum for ISS.

Accordingly, Ligado maintains that it is necessary for Planet to clearly demonstrate that the planned service will not cause interference and, in the absence of any such showing, that the Commission should reject the application or condition a grant of the requested modification on Planet operating the proposed ISS on an unprotected and non-harmful interference basis as promised by both Planet and Viasat.

¹ See Letter from J. Taubman, VP & Deputy Chief Government Affairs & Regulatory officer, Viasat, Inc. to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20250527-00129 (Sept. 9, 2025) (“Viasat Letter”).

² *Id.* at 1.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Jennifer A. Manner
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Senior Vice President, Regulatory Affairs and
International Strategy
AST & Science, LLC

/s/ Vernon G. Ross
Vernon G. Ross
Vice President, Legal and Regulatory Affairs
Ligado Networks LLC

September 19, 2025

cc: Jarrett S. Taubman, Viasat, Inc.
Danielle Pineres, Planet Labs PBC